



January 29, 2021

VIA ECF

Hon. Thomas J. McAvoy
Senior U.S. District Judge
Federal Building and U.S. Courthouse
15 Henry Street
Binghamton, NY 13901

Re: *United States v. Jacob Delaney; 1:20-CR-335 (TJM)*
Redactions to Motion to Suppress and
Supporting Materials

Dear Judge McAvoy:

We represent the Defendant, Jacob Delaney, in the above matter. On January 26th we filed a motion to suppress under seal with an application to seal the same pursuant to the Local Rules and the Protective Order issue in this matter. We now write in response to the Court's Order (Doc. No. 41) that the Defendant publicly file redacted versions of the Memorandum of Law, Attorney Declaration and publicly file all exhibits to the Attorney Declaration which are not covered by the Protective Order.

We conferred with the Government regarding these redactions and sealed exhibits and the Government concurs with our redactions and with our request to seal exhibits B, C, D, E, F and I. The remaining exhibits to the Attorney Declaration (Exhibits A, G and H) will be filed on ECF. Thank you for your attention to this matter.

Very truly yours,

O'CONNELL AND ARONOWITZ

By:

Scott W. Iseman, Esq.

cc: All parties (ECF)

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LEWIS A. ARONOWITZ
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